IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT:	Wolf et al.	**GROUP:**	3663
SERIAL NO:	10/642,453	**EXAMINER:**	Tuan C. To
FILING DATE:	August 15, 2003		
FOR:	DATA EXCHANGE IN A VEHICLE MULTIMEDIA SYSTEM		

Commissioner of Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

AMENDED APPEAL BRIEF

This appeal is in response to the Notice of Non-Compliant Appeal Brief dated April 9, 2008. The "Status of the Claims" section now includes a reference to the two withdrawn claims.

CERTIFICATE OF TRANSMISSION

I hereby certify that this document and the documents referred to as enclosed therein are being filed electronically via EFS-Web with the Commissioner for Patents on the date below.

Kim M. Fiorentino

Date

TABLE OF CONTENTS

I. REAL PARTY IN INTEREST

The real party in interest is Becker GmbH of Karlsbad, Germany.

II. RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

III. STATUS OF CLAIMS

On January 31, 2008, the appellant appealed from the final rejection of claims 1-9, 11-16 and 18-23 under 35 U.S.C. §102(b). Claims 10 and 17 are withdrawn. Claims 1-9, 11-16 and 18-23, which are set forth in the Claims Appendix attached hereto, are all the remaining claims in this application.

IV. STATUS OF AMENDMENTS

No amendments have been filed subsequent to the final rejection.

V. SUMMARY OF CLAIMED SUBJECT MATTER

The invention relates to a vehicle multimedia system.

Claim 1 recites a method of data exchange in a vehicular multimedia system that includes an interface unit and a plurality of multimedia units each connected to a data bus in the vehicle. The various elements recited in claim 1 are discussed in the specification in at least the following locations, amongst others:

FEATURES OF CLAIM 1	SPECIFICATION
A method of data exchange in a vehicular multimedia system that includes an interface unit and a plurality of multimedia units each connected to a data bus in the vehicle, comprising:	Page 2, line 22-Page 3, line 7; FIGs. 1-2 generally
establishing a radio connection between the interface unit and an external unit;	Page 3, lines 19-20; FIGs. 1-2, elements 18, 22
receiving from the multimedia units requests for the radio connection with the external unit; and	Page 3, lines 20-22; FIGs. 1-2, elements 10, 12-16, 18, 20, 22
coordinating/arbitrating at the interface unit requests for radio connection to the external unit.	Page 3, line 24-Page 4, line 6; FIGs. 1-2, elements 18, 22

Claim 6 recites a multimedia system suitable for use in a vehicle and capable of communicating with an external unit. The various elements recited in claim 6 are discussed in the specification in at least the following locations, amongst others:

FEATURES OF CLAIM 6	SPECIFICATION
A multimedia system suitable for use in a vehicle and capable of communicating with an external unit, comprising:	Page 2, line 22-Page 3, line 7; FIGs. 1-2 generally
an interface unit;	Page 3, line 18; FIG. 1, element 18; FIG. 2, elements 12, 18
a plurality of multimedia units;	Page 3, lines 17-18; FIGs. 1-2, elements 12-16
a data bus in the vehicle, where the interface unit and the plurality of multimedia units are each connected to the data bus; and	Page 3, lines 17-19; FIGs. 1-2, elements 10, 12-16, 18, 20
where the interface unit establishes a radio connection	Page 3, lines 19-20;

with the external unit, and	FIGs. 1-2, elements 18, 22
where the interface unit coordinates requests received over the data bus from the multimedia units for radio connections to the external unit.	Page 3, line 24-Page 3, line 6; FIGs. 1-2, elements 12-16, 18, 20, 22

Claim 13 recites a multimedia system for a vehicle. The various elements recited in claim 13 are discussed in the specification in at least the following locations, amongst others:

FEATURES OF CLAIM 13	SPECIFICATION
A multimedia system for a vehicle comprising a plurality of multimedia units connected to one another by a data bus in the vehicle,	Page 2, line 22-Page 3, line 7; FIGs. 1-2 generally
where an interface unit is situated at an arbitrary point of the data bus and is configured to establish a radio connection between the multimedia system and an external unit,	Page 3, lines 19-23 FIGs. 1-2, elements 10, 12-16, 18, 20, 22
where the interface unit coordinates requests generated by the multimedia units,	Page 3, lines 24-25; Page 4, lines 18-21; FIGs. 1-2, elements 10, 12-16, 18, 20, 22, 30
the requests being for radio connection with the external interface.	Page 3, lines 24-25; FIGs. 1-2, elements 12-16, 18, 20, 22

Claim 21 recites a multimedia system suitable for use in a vehicle and capable of communicating with an external unit. The various elements recited in claim 21 are discussed in the specification in at least the following locations, amongst others:

FEATURES OF CLAIM 21	SPECIFICATION
A multimedia system suitable for use in a vehicle and capable of communicating with an external unit, comprising:	Page 2, line 22-Page 3, line 7; FIGs. 1-2 generally
a plurality of multimedia units;	Page 3, lines 17-18; FIGs. 1-2, elements 12-16
means for establishing a radio connection with the external unit;	Page 3, lines 19-20; FIGs. 1-2, elements 18, 22
a data bus in the vehicle, where the means for establishing the radio connection and the plurality of multimedia units are connected to the data bus; and	Page 3, lines 17-19; FIGs. 1-2, elements 10, 12-16, 18, 20

where the means for establishing coordinates requests received over the data bus from the multimedia units for radio connections to the external unit.	Page 3, line 24-Page 4, line 6; FIGs. 1-2, elements 12-16, 18, 20, 22

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Whether claims 1-9, 11-16 and 18-23 are anticipated by U.S. Patent 5,574,514 to Tanihira (hereinafter "Tanihira").

VII. ARGUMENT

REJECTION UNDER 35 U.S.C. §102(B)

CLAIM 1

Claim 1 recites a method of data exchange in a vehicular multimedia system that includes an interface unit and a plurality of multimedia units each connected to a data bus in the vehicle. The method includes the steps of:

> "establishing a radio connection between the interface unit and an external unit;
> receiving from the multimedia units requests for the radio connection with the external unit; and
> coordinating/arbitrating at the interface unit requests for radio connection to the external unit." (emphasis added; cl. 1).

Upon a fair and proper reading, Tanihira fails to disclose or suggest the features of claim 1 emphasized above. With regard to the claimed feature of "*receiving from the multimedia units requests for the radio connection with the external unit*", this step requests access to the external unit, which a via radio connection with the interface unit. Nowhere in Tanihira is there any disclosure that the multimedia units (e.g., cassette player 32, CD player 33, DAT player 34) can request radio connection with the remote controller 64. Nor is there any disclosure or suggestion in Tanihira that the commanders 11, 12, the system control unit 21, or the monitor 63 can request radio connection with the remote controller 64. The commander 11 is merely a device that receives signals from the remote controller 64. The step of the interface unit coordinating/arbitrating for radio connection to the external CAN NOT be read onto any step performed by the commander 11 since the commander 11 is a one-way device that only receives from the remote controller 64.

Instead, Tanihira discloses that the remote controller 64 initiates communication with and transmits commands to the commander 11. (FIG. 2; col. 6, lines 36-42). Upon receipt of the commands from the remote controller 64, the commander 11 controls the operation of each signal source and image unit (i.e., multimedia units) (col. 6, lines 43-54). The clear import of Tanihira is that the multimedia units in Tanihira are operated solely in response to commands issued by a user, either through key inputs on the commander 11 or via the remote controller 64. **Significantly, none of the multimedia units in Tanihira has the ability to request radio connection with the remote controller 64.**

The connection between the remote controller 64 and the commander 11 is a one-way connection; that is, signals are communicated solely in the direction from the remote controller 64 to the commander 11. (FIG. 2; col. 6, lines 36-54). The commander 11 is merely a receiver of signals from the remote controller 64. **Notably, the commander 11 can not be construed as the claimed interface unit as alleged in the Official Action, since the claimed interface unit performs the function of arbitrating/coordinating - which is something the commander is incapable of doing.** That is, the commander 11 does not perform the steps of coordinating/arbitrating, since it is a dedicated receiver for signals from the remote controller 64.

There is no disclosure in Tanihira that the commander 11 include a device to transmit signals back to the remote controller 64. The commander 11 has no ability to request a radio connection with the remote controller 64. The commander 11 simply waits to receive commands from the remote control 64. Therefore, because the remote controller 64 is disclosed to communicate only unidirectionly with the commander 11, the multimedia units in Tanihira clearly have no ability to request radio connection with the remote controller 64, either themselves, or through the commander 11 or the monitor 63.

In light of the foregoing, Tanihira is incapable of anticipating claim 1.

CLAIM 6

Claim 6 recites a multimedia system suitable for use in a vehicle and capable of communicating with an external unit. The system includes:

> "an interface unit;
>
> a plurality of multimedia units;
>
> a data bus in the vehicle, where the interface unit and the plurality of multimedia units are each connected to the data bus; and
>
> where the interface unit establishes a radio connection with the external unit, and
>
> where the interface unit coordinates requests received over the data bus from the multimedia units for radio connections to the external unit." (emphasis added, cl. 6).

As set forth above with respect to claim 1, Tanihira merely discloses that the remote controller 64 sends commands to the commander 11. The commander 11 can not be construed as the claimed interface unit as alleged in the Official Action. Since none of the multimedia units in Tanihira have the ability to request radio connection with the remote controller 64. The commander 11 does not perform the step of coordinating requests from multiple multimedia units for access to the external unit, since it is a dedicated receiver for signals **from the** remote controller 64.

In light of the foregoing, Tanihira is incapable of anticipating claim 6.

CLAIM 13

Claim 13 recites a multimedia system for a vehicle comprising a plurality of multimedia units connected to one another by a data bus in the vehicle. The claimed system includes:

> "an interface unit is situated at an arbitrary point of the data bus and is configured to establish a radio connection between the multimedia system and an external unit, where the interface unit coordinates requests generated by the multimedia units, the requests being for radio connection with the external interface." (cl. 13).

As set forth above with respect to claims 1 and 6, none of the multimedia units in Tanihira have the ability to request radio connection with the remote controller 64. In addition, the commander 11 of Tanihira can not be construed as the claimed interface unit as alleged in the Official Action, since the claimed interface unit coordinates requests generated by the multimedia units for radio connection to the external interface, something that commander 11 clearly does not do. In Tanihira the multimedia units DO NOT generate requests for access to the remote controller 64.

Tanihira is incapable of anticipating claim 13.

CLAIM 21

Claim 21 recites a multimedia system suitable for use in a vehicle and capable of communicating with an external unit. The system includes:

> "a plurality of multimedia units;
> means for establishing a radio connection with the external unit;
> a data bus in the vehicle, where the means for establishing the radio connection and the plurality of multimedia units are connected to the data bus; and
> where the means for establishing coordinates requests received over the data bus from the multimedia units for radio connections to the external unit." (emphasis added, cl. 21).

Again, as set forth above with respect to claims 1, 6 and 13, none of the multimedia units in Tanihira have the ability to request radio connection with the remote controller 64. The commander 11 of Tanihira can not be construed as the claimed means for establishing as alleged in the Official Action, since the claimed means for establishing coordinates requests generated by the multimedia units for radio connection to the external interface. In Tanihira the multimedia units DO NOT generate requests for access to the remote controller 64.

Tanihira is incapable of anticipating claim 13.

CONCLUSION

For all the foregoing reasons, we submit that the rejection of claims 1-9, 11-16 and 18-23 is erroneous and reversal thereof is respectfully requested.

If there are any additional fees due in connection with the filing of this appeal brief, please charge them to our Deposit Account 50-3381. If a fee is required for any extension of time under 37 C.F.R. §1.136 not accounted for above, such an extension is requested and the fee should be charged to the above Deposit Account.

Respectfully submitted,

Patrick J. O'Shea
Reg. No. 35,305
O'Shea Getz P.C.
1500 Main Street, Suite 912
Springfield, MA 01115
(413) 731-3100, Ext. 102

CLAIMS APPENDIX

1. (Previously Presented) A method of data exchange in a vehicular multimedia system that includes an interface unit and a plurality of multimedia units each connected to a data bus in the vehicle, comprising:

establishing a radio connection between the interface unit and an external unit;

receiving from the multimedia units requests for the radio connection with the external unit; and

coordinating/arbitrating at the interface unit requests for radio connection to the external unit.

2. (Previously Presented) The method of claim 1, where establishing a radio connection comprises:

transmitting data/commands over the radio connection in both directions between the interface unit and the external unit.

3. (Previously Presented) The method of claim 1, further comprising:

receiving multimedia data at the interface unit via the radio connection; and

sending the received multimedia data from the interface unit over the data bus to at least one of the plurality of multimedia units.

4. (Previously Presented) The method of claim 1, where coordinating/arbitrating requests for radio connection comprises:

determining a sequence for processing simultaneously received requests.

5. (Previously Presented) The method of claim 4, where determining a sequence for processing requests comprises:

determining with a random selection criteria the sequence for processing simultaneously received requests.

6. (Previously Presented) A multimedia system suitable for use in a vehicle and capable of communicating with an external unit, comprising:

an interface unit;

a plurality of multimedia units;

a data bus in the vehicle, where the interface unit and the plurality of multimedia units are each connected to the data bus; and

where the interface unit establishes a radio connection with the external unit, and

where the interface unit coordinates requests received over the data bus from the multimedia units for radio connections to the external unit.

7. (Previously Presented) The multimedia system of claim 6, where the interface unit is located at an arbitrary location along the data bus.

8. (Previously Presented) The multimedia system of claim 6, where the interface unit receives multimedia data over the radio connection and sends the received multimedia data over the data bus to at least one of the multimedia units.

9. (Previously Presented) The multimedia system of claim 6, where the interface unit is situated in the data bus as a separate unit.

11. (Previously Presented) The multimedia system of claim 6, where the interface unit further comprises:

means for receiving a request from at least one of the multimedia units, for processing the received request, and for communicating with the external unit over the radio connection to fulfill the received request.

12. (Previously Presented) The multimedia system of claim 8, where the interface unit further comprises:

means for establishing full duplex radio communication between the interface unit and the external unit.

13. (Previously Presented) A multimedia system for a vehicle comprising a plurality of multimedia units connected to one another by a data bus in the vehicle, where an interface unit is situated at an arbitrary point of the data bus and is configured to establish a radio connection between the multimedia system and an external unit, where the interface unit coordinates requests generated by the multimedia units, the requests being for radio connection with the external interface.

14. (Previously Presented) The multimedia system of claim 13 where the interface unit is situated along the data bus as a separate unit.

15. (Previously Presented) The multimedia system of claim 13, where the interface unit comprises:

a coordination unit configured to perform the coordination of the requests for radio connections to the external unit, which it receives from the multimedia units.

16. (Previously Presented) The multimedia system of claim 13, where the interface unit is situated along the data bus as a separate unit.

18. (Previously Presented) The multimedia system of claim 13, where the interface unit receives traffic information in response to a request transmitted from the interface unit to the external unit.

19. (Previously Presented) The multimedia system of claim 18, where the external unit transmits or receives traffic information from the multimedia system.

20. (Previously Presented) The multimedia system of claim 15, where the coordination unit comprises:

means for determining with a random selection criteria the sequence for processing simultaneously received requests.

21. (Previously Presented) A multimedia system suitable for use in a vehicle and capable of communicating with an external unit, comprising:

a plurality of multimedia units;

means for establishing a radio connection with the external unit;

a data bus in the vehicle, where the means for establishing the radio connection and the plurality of multimedia units are connected to the data bus; and

where the means for establishing coordinates requests received over the data bus from the multimedia units for radio connections to the external unit.

22. (Previously Presented) The multimedia system of claim 21, where the means for establishing determines with a random selection criteria the sequence for processing simultaneously received requests.

23. (Previously Presented) The multimedia system of claim 22, where means for establishing establishes full duplex radio communication with the external unit.

EVIDENCE APPENDIX

None

RELATED PROCEEDINGS APPENDIX

None